

To the Rhode Island Board of Elections

I write with concern over what I believe to be a large-scale ongoing violation of Rhode Island's campaign finance laws by the NRA Political Victory Fund PAC.

The National Rifle Association of America Political Victory Fund (hereafter referred to as "NRA-Federal PAC") is a national committee registered with the Federal Election Commission (ID Number C00053553) as a Separate Segregated Fund located in Fairfax, Virginia.¹ In order to participate in elections in the State of Rhode Island, this organization has also registered a PAC with the Rhode Island Board of Elections (hereafter referred to as "NRA-RI PAC").²

There is reason to believe that NRA-RI PAC has been circumventing contribution disclosure rules as required by § 17-25-3(3). Specifically, NRA-RI PAC has failed to disclose any of the required donor information such as the name, address, and place of employment of a contributor as required by § 17-25-11(a)(3)(i). As such, it is impossible to tell whether NRA-RI PAC received excessive contributions of \$1000 or more per annum from any individual or organization, as prohibited by § 17-25-10.1(a).

NRA-RI PAC maintains a balance of \$0 cash-on-hand at the end of each report. It appears to raise precisely the amount that it spends each reporting period. Moreover, NRA-Federal PAC reports making the same exact contributions to candidates in Rhode Island that NRA-RI PAC does. It is therefore reasonable to question whether the funds that end up in the accounts of candidates in Rhode Island are derived directly from the national committee, NRA-Federal PAC, which is a source that is not permissible by Rhode Island law.

The strong evidence suggesting that these contributions are directly from NRA-Federal PAC has several implications, the most important of which is the aforementioned issue that no donor information is disclosed to the public. Because federal law requires that only contributors aggregating over \$200 (twice the Rhode Island threshold of \$100) be disclosed, it is certain that many contributors required by RI law to be disclosed to the public never are, yet their contribution dollars influence the outcomes of elections in RI. Moreover, because it is unclear which contributors to NRA-Federal PAC are subsequently earmarked for RI elections, it is impossible to know whether such contributions 1) exceed contribution limits (federal contribution limits are over twice as high as RI) and 2) are otherwise impermissible under RI law (federal law allows PACs to receive contributions from unregistered committees and organizations in amounts not exceeding \$1000).

At the very least, this matter is worthy of further investigation by the RI Board of Elections. Never has the potential for large, national interests to disproportionately influence the outcomes of local elections been more prevalent. For that reason, it is necessary for the Board of Elections to be as unambiguous as possible in its execution of its campaign finance regulations.

As an example of the behavior described above, I have attached the reports from the first and second quarters of 2013 for NRA-RI PAC and a list of the associated NRA-Federal PAC contributions. However, these practices appear to have persisted since at least the first quarter of 2002, the most recent report available in the online ERTS

¹ See [Statement of Organization](http://images.nictusa.com/pdf/549/29991743549/29991743549.pdf) here or refer to URL <http://images.nictusa.com/pdf/549/29991743549/29991743549.pdf>

² RI Registration Key #259

reporting system. I have attached a summary of the contributions over this period from the ERTS system.

Under pain and penalty of perjury, I attest that the above statements are, to the best of my knowledge, fully accurate. Please feel free to contact me with any questions.

Sincerely,

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